REMARKS/ARGUMENTS

Claims 1-31 are pending. No claims are amended, cancelled, or added. In view of the following arguments, withdrawal of all outstanding rejections to pending claims 1-31 is respectfully requested.

Claim Rejections Under 35 USC §103(a)

Claims 1-31 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent No. 6,314,449 to Gallagher et al. ("Gallagher") in view of U.S. Patent no. 6,691,159 to Grewel et al ("Grewal"). This rejection is traversed.

As a preliminary matter, reasons why the cited combination does not teach or suggest the features of claims 1-31 were discussed in a Response dated August 17, 2004 to an Office Action dated June 06, 2004. The arguments presented in that Response are not repeated verbatim herein. However, those arguments are hereby incorporated by reference. The Office is urged to reconsider those arguments in view of the following additional arguments.

Claim 1 recites in part "providing context-sensitive help from a first computer to a second computer for a Web-based user interface (UI) of the first computer, the method comprising", and "receiving a request for context sensitive help at the first computer from the second computer, the request corresponding to a first Web page of a Web-based UI of the first computer". Nowhere does Gallagher in view of Grewal teach or suggest these claimed features.

In addressing claim 1, the Action at page 3 admits that Gallagher does to describe "providing context-sensitive help from a first computer to a second computer for a Web-based user interface (UI) of the first computer", as claim 1 recites. To provide this missing feature, the Action relies on the teachings of

Grewal to conclude that it would have been obvious to one of ordinary skill in the art, in view of Gallagher and Grewal, at the time of invention to modify the context sensitive help of the Gallagher to include Web-based UI communication. This conclusion is unsupportable.

Firstly, prior art patents are references only for what they clearly disclose or suggest. It is not proper to use a patent as a reference to modify its structure to one which prior art references do not suggest. Modification unwarranted by the disclosure of a reference is unwarranted. Since neither Gallagher and/or Grewal teach or suggest the use of context sensitive help of any type, modification of these references by the Action to include the missing feature of "context-sensitive help" is unwarranted and improper.

More specifically, Gallagher at col. 3, lines 1-10, in the Abstract, and in reference to Figs. 4 and 5, teaches that in response to a user selecting an application log message **304** that has been displayed in a browser window, help-text **402** *explaining the content* of the selected log message is retrieved and displayed. The help text includes "a detailed explanation of the message, and the recommended user response" (Abstract). Thus, the help-text of Gallagher is *content specific* to explain what a user selected message (i.e., data) means. Clearly this content specific help of Gallagher *is not* "context-sensitive help" as claim 1 recites. It is respectfully submitted, that "context sensitive help" is not content specific help. Context-sensitive help provides context for a particular object feature (e.g., a button, a scroll bar, etc.) of a program that the user is in the process of querying. Nowhere does the content specific help of Gallagher teach or suggest "context-sensitive help" of any type. Thus, a system of Gallagher may never use "context-sensitive help", as claim 1 recited, in any manner.

Grewal is also completely silent with respect to the use of "context sensitive help" of any type. Grewel in the Abstract and at col. 1, lines 40-43, merely describes a system to provide users "with education, information and computer assisted help on a specific subject, problem, or a project." To these ends, Grewal at cols. 3 and 4 describes user interfaces of Figs. 4 and 5, which provide hypertext links for a user to link to FAQs, articles, tips and tricks, tutorials, etc., chat and e-mail capabilities, keyword searches, and so on. Nowhere does this description of Grewal teach or suggest that a server provides a client with context-sensitive help of any for its user interfaces.

Additionally, let's take a look at what Grewal teaches at col. 2, lines 22-37:

> *"FIG. 1 is a block diagram of a system 10 in accordance with one embodiment of the present invention. System 10 includes a server system 12 and a plurality of client systems 14 connected to server system 12 . In one embodiment, a client system 14 is a computer including a web browser. Server system 12 is accessible to client system 14 via the Internet. Client system 14 is interconnected to the Internet through many interfaces including dial-in-connections, cable modems, special high- speed ISDN lines and networks such as local area networks (LANs) or wide area networks (WANs). Client system 14 could be any client system capable of interconnecting to the Internet including a web-based phone or other web-based connectable equipment. Servers storing information are integrated with server system 12 and can be accessed by potential users at one of client systems 14 by logging onto server system 12."*

Although this portion of Grewal teaches a plurality of client systems connected to a server, nowhere does this portion of Grewal teach or suggest "providing context-sensitive help from a first computer to a second computer for a Web-based user interface (UI) of the first computer" as claim 1 recites.

Next, let's take a look at what Grewal teaches at col. 4, lines 46-65:

"FIG. 8 describes an algorithm 240 as used by the system to help a user when the user logs on to a home page of the web site through client system 14 . After logging 242 , the user requests help through client system 14 by selecting one of a hypertext link displayed out of all displayed 244 hypertext links. Once the user makes a specific selection, the specific selection is sent to server system 12 . The sending 246 is accomplished in response to click of a mouse or to a voice command. Once server system 12 receives 248 the request, server system 12 displays the information in response to this request on client system 14. Server system 12 accesses 250 the database and retrieves 252 related information from the database. The requested information is provided 254 to client system 14 by downloading the information from server 12 . In one embodiment, client system 14 as well as server system 12 are protected from access by unauthorized individuals."

This portion of Grewal teaches that a user logged on to a homepage in a web site can select a hypertext link to retrieve information linked to the hypertext link. Clearly, nowhere does this description teach or suggest the use of "context-sensitive help" of any type, as claim 1 recites. It is respectfully submitted, and with respect to the claimed subject matter, this portion of Grewal does not add anything of value to Grewal's teaching of col. 2, lines 22-37, and Figs. 4 and 5, which were already discussed above. Thus, for this additional reason, a system of Gallagher in view of Grewal may never "receiving a request for context sensitive help at the first computer from the second computer, the request corresponding to a first Web page of a Web-based UI of the first computer", as Applicant claims.

Moreover, let's take a look at what Grewal teaches at col. 1, lines 1-7:

"processing received request against the data storage device 44 containing a variety of help related information, a retrieving component 50 to retrieve information from the data storage device, and an information fulfillment component 54 that downloads the requested information after retrieving from the data storage device to a plurality of users in the order in which the requests were received by the receiving component."

This portion of Grewal merely teaches that help related information retrieved from a data storage device is downloaded to requesting users. This teaching is completely silent with respect to "context-sensitive" help of any kind. With respect to the claimed subject matter, this portion of Grewal does not add anything of value to Grewal's teachings of col. 2, lines 22-37, col. 4, lines 46-65, and Figs. 4 and 5, each of which were already discussed above. Thus, for this additional reason, a system of Gallagher in view of Grewal may never "receiving a request for context sensitive help at the first computer from the second computer, the request corresponding to a first Web page of a Web-based UI of the first computer", as Applicant claims.

In view of the above, neither Gallagher and/or Grewal teach or suggest the use of context sensitive help. Instead, the cited combination teaches that a server may download *non-context sensitive help* to users responsive to receipt of requests for such non-context sensitive help from a client. Thus, the Action's unwarranted modification of Gallagher in view of Grewal to include context-sensitive help modifies the structure of the combination to a structure that neither reference singly or in combination suggests, is improper. As such, the cited references cannot be combined in the manner suggested by the office to support a prima facie 35 USC §103 rejection of claim 1.

Accordingly, and for these reasons alone, the 35 USC §103(a) rejection of claim 1 over Gallagher in view of Grewal is improper and should be withdrawn.

As an additional matter, if claim 1 is again rejected under this same rational, it is respectfully requested for the Office to particularly point out where

these cited references address "context-sensitive help" as claim 1 recites—especially since the phrase is not used a single time in either cited reference.

Claim 1 also recites additional features that are not taught or suggested by the cited combination. For example, claim 1 further recites "responsive to receiving the request, the first computer: determining a set of context sensitive information that corresponds to the first Web page" and "generating a second Web page comprising the context sensitive information", and "providing the second Web page to the second computer for presentation". For the reasons already discussed, the cited combination does not teach or suggest "determining a set of context sensitive information".

Accordingly, and for each of these additional reasons, the 35 USC §103(a) rejection of claim 1 over the cited combination of Gallagher in view of Grewal is improper and should be withdrawn.

Claims 2-9 depend from claim 1 and are allowable over the cited combination at least by virtue of this dependency. Accordingly, the 35 USC §103(a) rejection of claims 2-9 should be withdrawn.

Claim 10 recites "providing context-sensitive help for a Web-based user interface (UI) of a first computer to a second computer", "receiving a request for a set of context sensitive help corresponding to a Web-based UI of the first computer, the request being received at the first computer, the Web-based UI corresponding to one or more functions of the first computer, the Web-based UI being presented on the second computer, the first computer being operatively coupled to the second computer over a network", and "responsive to receiving the request, the first computer: generating a second Web page comprising the context-

sensitive help" and "communicating the second Web page to the second computer for presentation."

For the reasons already discussed above with respect to claim 1, the cited combination of Gallagher in view of Grewal does not teach or suggest these claimed features.

Accordingly, the 35 USC §103(a) rejection of claim 10 is improper and should be withdrawn.

Claims 11-18 depend from claim 10 and are allowable over the cited combination at least by virtue of this dependency. Accordingly, the 35 USC §103(a) rejection of claims 11-18 should be withdrawn.

Claim 19 recites in part "communicating the Web based UI to a different system for presentation", "responsive to receiving a request for context sensitive help, determining a set of context-sensitive help that corresponds to the Web-based UI", and "communicating the context-sensitive help to the different system for presentation."

At least for the reasons already discussed above with respect to claim 1, the cited combination of Gallagher in view of Grewal does not teach or suggest these claimed features.

Accordingly, the 35 USC §103(a) rejection of claim 19 is improper and should be withdrawn.

Claims 20-25 depend from claim 19 and are allowable over the cited combination at least by virtue of this dependency. Accordingly, the respective 35 USC §103(a) rejections of claims 20-25 are improper and should be withdrawn.

Claim 26 recites in part "[a] user interface comprising [...] a first area for displaying, on a first device, a remote UI that corresponds to a second device", and

"a second area within the first area for providing a context-sensitive help control for accessing a set of context sensitive help that corresponds to the remote user interface."

At least for the reasons already discussed above with respect to claim 1, the cited combination of Gallagher in view of Grewal does not teach or suggest these claimed features.

Accordingly, the 35 USC §103(a) rejection of claim 26 is improper and should be withdrawn.

Claims 27-31 depend from claim 26 and are allowable over the cited combination at least by virtue of this dependency. Accordingly, the respective 35 USC §103(a) rejections of claims 27-31 are improper and should be withdrawn.

Conclusion

Claims 1-31 are in condition for allowance and action to that end is respectfully requested. Should any issue remain that prevents allowance of the application, the Office is encouraged to contact the undersigned prior or issuance of an advisory action.

Respectfully Submitted,

Dated: _January 03, 2005_   By: _Brian Hart_

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